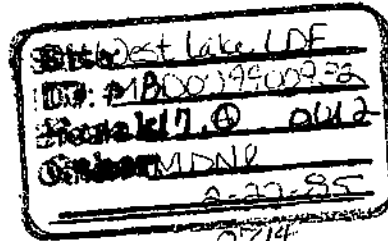


MISSOURI DEPARTMENT OF NATURAL RESOURCES

P.O. Box 176 Jefferson City, Missouri 65102

MEMORANDUM



DATE: February 27, 1985
TO: Ron Kucera, Deputy Director, Department of Natural Resources
THROUGH: Robert Schreiber, Director, Div. of Environmental Quality
David Bedan, Director, Waste Management Program
FROM: John Doyle, P.E., Chief, Permits Section, WMP
SUBJECT: Proposed Expansion to the West Lake Sanitary Landfill,
St. Louis County, MO.

The Permits Section of the Waste Management Program has begun to receive inquiries from various people as to the status of the proposed West Lake Sanitary landfill expansion. Some of the calls have been from legislators and lawyers, speaking on behalf of the applicant expressing a concern of needing quick action by the department due to the limited time available under the existing permit. I would expect the requests for quick action to intensify in the near future, therefore, it is important that everyone be aware of the issues surrounding this application.

To the best of my knowledge, West Lake has one (1) month or less of permitted life at the site. However, short term landfill capacity in northwest St. Louis County is not subject to a crisis situation by the depletion of the permitted area and temporary closing of West Lake Landfill. Approximately 2 miles south of the West Lake Landfill is the Fred Weber Sanitary Landfill, which has ample permitted volume and the capability to handle additional truck traffic. Therefore, there does not appear to be a legitimate need for the premature issuance of a decision on this permit application. I've explained more specifics below.

On October 1, 1985, the WMP received an application for the expansion of the West Lake Landfill. At that time, I was told that West Lake had approximately 3 months of permitted life left. At best, the application review of a perfect submittal for a large site would take 4-6 months, however, this application has serious deficiencies. There is no apparent reason why the applicant or the consultant did not understand the timeframes involved in completing a permit review since they have both been involved in solid waste management for several years. Therefore, there is no justifiable reason why an application was submitted with just three months of permitted life remaining.

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SUPERFUND RECORDS

John D. Ashcroft Governor

DNR 0181

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The proposed expansion would be a continuation of the existing operation, which consists of disposing of solid waste in the finished portions of the limestone quarry. This expansion request would culminate the existing series of disposal areas at the present location, and encompasses approximately 33 acres and will average 240 feet in depth, resulting in an expected landfill life of 30 years (if present incoming waste quantities remain constant).

Several issues indicate a need for a thorough review of this expansion request by the Permits Section:

1. The public concern with past practices at the West Lake Landfill site.

Initially, the Permits Section feels the proposed expansion should not have an adverse affect on past disposal areas or existing problem areas, however, this aspect of concern deserves further consideration. Also, any problem areas which may presently exist at the site should not adversely affect the proposed fill area.

2. The extremely large volume and long life of the proposal.

This situation presents greater potential for long term methane gas and leachate problems, due to the large volume of waste, and requires more comprehensive detailed plans upfront, due to the long life expectancy and the fact that permits are issued for the life of the facility.

3. The site specific issues related to geology, landfill management and post-closure site maintenance.
 - a. Initial review of the application indicates that there are several areas of the proposed quarry which may have geologic deficiencies. The present application did not present comprehensive information and discussion on all of the geologic and hydrologic aspects of the proposed expansion.
 - b. The application proposes some landfill management philosophies which may be acceptable in the end, but deserve further discussion and clarification. In particular, proposals surrounding surface water control and grading of intermediate areas, methane gas management and leachate generation and management require further evaluation and discussion.

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- c. The proposed expansion represents the culmination of a multi-phase disposal operation in the portion of the site from which limestone has been quarried. Upon completion of the proposed expansion, all quarry reclamation would be complete. The presently completed landfill areas actively generate leachate and methane gas in quantities which warrant active, rather than passive, control systems. The doubling or tripling of the deposited volume of waste in the abandoned quarries can only compound the potential problem, therefore, long-term, post-closure care may be an item of more significance at this site.

I do not wish to present a completely uncontrollable situation, however, I also do not want the department to be in a position of permitting a landfill site for which all the questions have not been answered. My staff is presently completing review of the application and a comprehensive comment letter will be sent to the applicant and their engineer. We will not be able to say whether the site and the proposal are acceptable or unacceptable until a complete response to the comment letter is received.

JDD:TRG:lh